# BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

BULK PARCEL RETURN SERVICE : EXPEDITED MINOR CLASSIFICATION CASE :

DOCKET NO. MC99-4

NOTICE BY UNITED PARCEL SERVICE OF INTERVENTION UNDER COMMISSION RULE 20 (June 11, 1999)

> John E. McKeever Kenneth G. Starling Nicole P. Kangas Attorneys for United Parcel Service

#### Service should be made upon:

John E. McKeever Piper & Marbury L.L.P. 3400 Two Logan Square 18th and Arch Streets Philadelphia, PA 19103-2799 (215) 656-3310

FAX: (215) 656-3301

E-MAIL: jmckeever@pipermar.com

Linda Shepherd United Parcel Service Corporate Strategy Group 55 Glenlake Parkway, N.E. Atlanta, GA 30328-3498 (404) 828-6146

FAX: (404) 828-8088

E-MAIL: Ishepherd@corpmail.ups.com

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BULK PARCEL RETURN SERVICE	
<b>EXPEDITED MINOR CLASSIFICATION CAS</b>	iΕ

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# NOTICE BY UNITED PARCEL SERVICE OF INTERVENTION UNDER COMMISSION RULE 20

Pursuant to Section 20 of the Commission's Rules of Practice, 39 C.F.R. § 3001.20, United Parcel Service ("UPS") hereby gives notice of its intervention as a full participant in this proceeding and states the following in support of its intervention:

- 1. UPS provides delivery services throughout the United States via air and ground operations. UPS also provides international delivery services.
- 2. UPS competes with the United States Postal Service and is concerned about and affected by the application of the Postal Reorganization Act of 1970, as amended, 39 U.S.C. § 101 et seq., in all areas where the Postal Service competes with private enterprise, including UPS. These areas include parcel delivery services for the types of parcels which are the subject of the Postal Service's request initiating this proceeding.
- 3. UPS is also a substantial user of postal services, especially First Class Mail.
- 4. As a competitor of the Postal Service and as a user of postal services,
  UPS will be affected by and is interested in the changes proposed by the Postal Service
  in this proceeding. In particular, UPS is concerned that the proposed changes comply

with the Postal Reorganization Act, including the factors set forth in Sections 3622 and 3623 of the Act.

5. UPS is not yet in a position to determine whether to request a hearing in this proceeding. If hearings are held, UPS presently intends to participate actively in them.

WHEREFORE, United Parcel Service gives notice of its intervention in this proceeding.

Respectfully submitted,

John E. McKeever Kenneth G. Starling Nicole P. Kangas

Attorneys for United Parcel Service

PIPER & MARBURY L.L.P. 3400 Two Logan Square 18th and Arch Streets Philadelphia, PA 19103-2799 (215) 656-3300

and

1200 19th Street, N.W. Washington, DC 20036-2430 (202) 861-3900

Of Counsel

Dated: June 11, 1999

### CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

Nicole P. Kangas

Dated: June 11, 1999 Philadelphia, PA